

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FILED  
U.S. OFFICE  
MAY 18 2005 P 2:30

LIBERTY MUTUAL INSURANCE )  
COMPANY AND SUBSIDIARIES, )  
Plaintiff, )  
United States of America, )  
Defendant. )  
\_\_\_\_\_  
Civil No. \_\_\_\_\_

64401  
50-00  
JCK  
5/19/05 JAC

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.5.3 of the United States District Court for the District of Massachusetts, I, John A. Lacaire, a member in good standing of the bar of this Court, hereby move the Court to admit Joseph A. Sergi, an attorney who is not a member of the bar of this Court, to represent the plaintiff in the above-captioned matter. In support of this motion, Mr. Sergi submits the following:

1. He is a member in good standing of the bars of the District of Columbia, and the States of New Jersey and New York, the United States District Courts for the District of Columbia and the State of New Jersey, the United States Court of Appeals for Federal Circuit, and the United States Supreme Court. A certificate of good standing from the United States District Court for the District of Columbia is attached.

2. He agrees to submit to and comply with all provisions and requirements of the rules of conduct applicable to attorneys admitted to practice before this Court in connection with his pro hac vice representation in this case.

3. He will comply with the associate counsel requirements of LR. 83.5.3 by associating with John A. Lacaire, an attorney who has been admitted to the bar of this Court under LR. 83.2(b) and (c) and who has entered an appearance in this case.

4. He can be contacted at the following location: Scribner, Hall & Thompson, LLP, 1875 Eye Street, N.W., Suite 1050, Washington, D.C., 20006, telephone number (202) 434-9172.

WHEREFORE, undersigned counsel respectfully moves to admit Joseph A. Sergi pro hac vice to appear before this Court on behalf of the plaintiff in the above-captions matter.

Respectfully submitted,

Date: May 16, 2005

  
John A. Lacaire  
Black, Cetkovic, & Whitestone  
200 Berkeley Street Floor 16  
Boston, MA 02116

**United States District Court  
for the District of Columbia  
CLERK'S OFFICE  
333 Constitution Avenue, NW  
Washington, DC 20001**

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I, **NANCY M. MAYER-WHITTINGTON**, Clerk of the United States

District Court for the District of Columbia, do hereby certify that:

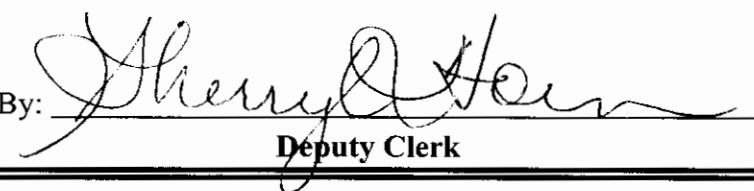
**JOSEPH A. SERGI**

was, on the 5th day of May A.D. 2003 admitted to practice as an Attorney at Law at the Bar of this Court, and is, according to the records of this Court, a member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of said Court in the City of Washington this 9<sup>th</sup> day of May, A.D. 2005.

**NANCY M. MAYER-WHITTINGTON, CLERK**

By:

  
**Deputy Clerk**